

# Rickner PLLC

Rob Rickner | rob@ricknerpllc.com

October 31, 2022

**Via ECF**

Honorable Vera M. Scanlon  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Wills et al v. Microgenics Corporation et al.*, 20-cv-04432-BMC-VMS

Dear Judge Scanlon,

This firm represents Plaintiff Ruben Wills in the above-captioned cases. Pursuant to the Court's September 21, 2022 Order, we write jointly with all counsel to provide the Court with a proposed schedule for the completion of fact discovery and table of anticipated depositions with approximate dates.

The parties propose the following schedule for discovery:

- Paper discovery complete by January 31, 2023
- Production of any ESI discovery complete by February 28, 2023
- March 1, 2023: Depositions to commence
- June 30, 2023: All fact discovery including depositions complete

The parties in *Wills* adopt the tentative *Steele-Warrick* proposed deposition schedule, except to note that the parties are working cooperatively and hope to have any depositions related to Mr. Wills and the other parties in the *Wills* case complete by the end of April 2023.

Respectfully,

/s/

Rob Rickner